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Attorneys for Plaintiff
VERIGY US, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VERIGY US, INC, a Delaware Corporation

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual;
WESLEY MAYDER, an individual; SILICON
TEST SYSTEMS, INC., a California Corporation;
and SILICON TEST SOLUTIONS, LLC, a
California Limited Liability Corporation,
inclusive,

Defendants.

Case No. C07 04330 RMW (HRL)

**PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Howard R. Lloyd
Ctrm: 2

Complaint Filed: August 22, 2007
Trial Date: None Set

AND RELATED CROSS-ACTIONS

1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Plaintiff Verigy U.S., Inc. ("Plaintiff"
2 or "Verigy") requests that the following materials be filed under seal, as they contain confidential
3 information that is protected by the Stipulated Protective Order entered by the Court on August
4 29, 2007. The documents submitted under seal include: Exhibits A-F and H-I of the Michael W.
5 Stebbins Declaration In Support Of Verigy's Motion For Protective Order Relieving Verigy Of
6 Duty To Respond Further To Second Amended Notice Of Rule 30(B)(6) Deposition Propounded
7 By Defendants.

8 These materials (hereafter "the Materials") disclose information that has been designated
9 as "Confidential" or "Highly Confidential – Attorneys' Eyes Only" by the parties under the
10 Protective Order, without objection to those designations (although Verigy reserves its rights to
11 challenge such designations pursuant to the Stipulated Protective Order). Although the
12 information in the Materials has been designated as protected from disclosure under the Protective
13 Order, Verigy must rely on this information in support of its Application. The parties'
14 confidentiality interest therefore overcomes the right of public access to the record, as a substantial
15 probability exists that the parties' overriding confidentiality interest will be prejudiced if the
16 record is not sealed. Further, the proposed sealing is narrowly tailored and no less restrictive
17 means exist to achieve this overriding interest

18 Pursuant to Local Civil Rule 79-5(b)-(c), Verigy therefore lodges the Materials with this
19 Court, and respectfully requests leave to file the aforementioned documents under seal.

20 Respectfully submitted.

21 Dated: August 25, 2008

BERGESON, LLP

22 By: /s/
23 Colin G. McCarthy
24 Attorneys for Plaintiff
25 VERIGY US, INC.
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